

April 23, 2025

Hon. Sarah L. Cave
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: Carolyn Mitchell v. Commissioner of Social Security, 1:24-cv-05513
Extension Request on Plaintiff's Brief¹

Dear Judge Cave,

I write with consent of defendant's counsel to respectfully request that Your Honor extend the deadline for Plaintiff's Brief in Response to Defendant's Motion to Dismiss (ECF 22) for 60 days, from April 27, 2025 until June 26, 2025. This is my first request for this action.

I need more time to prepare my response because I have exhausted my efforts to obtain pro bono counsel over the last 60 days, and it will be difficult for me to meet these deadlines without assistance. The Court provided me with contact information for City Bar Justice Center's Federal Pro Se Clinic, with whom I am now working.

With the assistance of the CBJC clinic, Plaintiff attempted to find pro bono counsel through multiple avenues and organizations. Plaintiff was in discussions with one attorney specializing in social security practice, who read the administrative record and Defendant's motion papers. Plaintiff and the Clinic anticipated communication from this attorney as to whether or not he would take Plaintiff's case pro bono. Plaintiff got in contact with the attorney as of today's date and is scheduled to discuss his decision regarding taking the case tomorrow, April 24, 2025.

Accordingly, with defendant's consent, I propose the following schedule:

June 26, 2025 deadline for Plaintiff's Brief

August 25, 2025 deadline for Defendant's Reply to Plaintiff's Brief

Respectfully,

Carolyn Mitchell
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PRO SE

Plaintiff's Letter-Motion at ECF No. 28 is GRANTED IN PART, such that Plaintiff must file any opposition to Defendant's Motion to Dismiss or, in the Alternative, for Summary Judgment by **Friday, May 30, 2025**. Defendant's reply shall be due by **Friday, July 25, 2025**. In addition, by **Friday, May 2, 2025**, pro bono counsel shall file a notice of appearance on the docket or Plaintiff shall file a letter advising the Court as to the status of her efforts to retain counsel.

The Clerk of Court is respectfully directed to close ECF No. 28.

SO ORDERED. 4/25/2025


SARAH L. CAVE
United States Magistrate Judge

¹ This document was prepared with the assistance of the City Bar Justice Center's Legal Clinic for Pro Se Litigants in the SDNY.